



Water Kennecott Discharges

- Excess tailings pond decant water (7,000 20,000 ac-ft/yr)
 - Mine dewatering
 - Storm water
 - Groundwater remediation
 - Imported water
- Wetlands discharges
- Excess imported water





Regulation of Pollutants

- Regulated pollutants based on an assessment of reasonable potential for constituents that could exceed pertinent standards, a process that is governed by regulation
- Longer list of regulated pollutants at the tailings impoundment discharge in the past—collection of data indicated that certain of the pollutants were not found in the discharge



Foundation for Effluent Limitations

- EPA Effluent Guidelines for the Ore Mining and Dressing Point Source Category
- EPA Effluent Guidelines for Nonferrous Metals
 Manufacturing Point Source Category
- Utah Secondary Treatment Standards
- Utah Water Quality Standards
- Best Professional Judgment
- Site Specific Study



Outfall 012 Effluent Limitations

- Regulated Pollutants
 - Total Suspended Solids
 - Arsenic
 - Cadmium
 - Copper
 - Lead
 - Mercury
 - Zinc
 - Selenium
 - Cyanide
 - pH
 - Oil and Grease



Regarding Regulation of Water Quality in Great Salt Lake, Kennecott

- Has confidence in the Division of Water Quality programs and staff,
- Believes allowing properly regulated discharges provides an important societal benefit,
- Supports adoption of numeric standards, *provided* sitespecific chemical conditions and biota are considered,
- Believes that standards should be based on protection of ecosystem at a population level,



Regarding Regulation of Water Quality in Great Salt Lake, Kennecott

- Is concerned about the steep cost of developing site-specific standards,
- Believes that non-point sources need balanced consideration if loading reductions ever required, and
- Cautions against emotional calls for ultra-conservatism: mandated treatment should have a clear and scientifically demonstrable ecological benefit.